

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)) Criminal No.: 22-cr-10038-IT
ARIEL LEGASSA,)
Defendant)
)

GOVERNMENT'S REQUEST FOR *VOIR DIRE*

In addition to the Court's customary questions of the venire, the United States respectfully requests that the Court ask prospective jurors the following *voir dire* questions:

1. This is a federal criminal case brought in the name of the United States of America. The Federal Government consists of many agencies and departments, including the Department of Justice, the United States Attorney's Office, and the Federal Bureau of Investigation (also known as the "FBI"). Have you, a member of your family, or anyone close to you ever had any dealings with the federal government, including these entities, whether favorable or unfavorable, which might influence your consideration of the evidence in this case?
2. Have you, a family member, or someone close to you had an experience, favorable or unfavorable, with a law enforcement official or with the criminal justice system which might influence your consideration of this case?
3. This is a criminal case involving, among other things, allegations of mail fraud and unlawful monetary transactions. Do any of you hold any belief, feeling, or prejudice against these types of prosecutions such that you could not sit as a fair and impartial juror in this case?
4. Do you have any views or reservations concerning law enforcement or the administration of criminal justice that would prevent you from rendering a fair and impartial verdict in this case?

5. This case involves an entity known as New England Sports Network or NESN. Are you employed by or is any member of your family or any close friend employed by NESN? Do you have any views about NESN that will make it difficult for you to be fair and impartial in this case?

6. Have you, any member of your family or anyone else close to you ever been involved in a dispute at work that led to you, your family member, or the person close to you being fired or asked to resign? If so, would that experience make it difficult for you to be fair and impartial in this case?

7. At the end of the case, the jurors will be asked to deliberate and decide, unanimously, whether the Defendant is guilty or not guilty. Some people, for religious or other reasons, think that one person should not sit in judgment of another person. Do you have any beliefs or strong feelings that will make it difficult for you to sit in judgment and reach a verdict in this case?

8. At the end of the case, the Court will instruct you on the law you are to apply. Jurors are obligated to follow the law as told to them by the Court. Do you have any concerns that you might not be able to follow the law, as instructed by the Court, if you do not agree with the law or the legal principles that the Court tells you to apply?

9. If you are selected as a juror, you will not be permitted to read or listen to any news about this case or to conduct any research about this case, the subject of the case or the people involved, including any searches on the Internet. You will also not be permitted to speak, post, or blog about this trial or about your participation while the trial or deliberations are ongoing. Would anyone have difficulties complying with this rule?

Respectfully submitted,

JOSHUA S. LEVY
United States Attorney

By: */s/ Mackenzie A. Queenin*
BENJAMIN A. SALTZMAN
MACKENZIE A. QUEENIN
Assistant United States Attorneys

Date: September 25, 2023

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Mackenzie A. Queenin
MACKENZIE A. QUEENIN
Assistant United States Attorney

